

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-11069 (CTG)
)
) (Jointly Administered)
)

**FIRST SUPPLEMENTAL
DECLARATION OF BRIAN WHITTMAN
IN SUPPORT OF APPLICATION OF THE DEBTORS
TO RETAIN ALVAREZ & MARSAL NORTH AMERICA, LLC AS
FINANCIAL ADVISORS TO DEBTORS AND DEBTORS IN POSSESSION
PURSUANT TO SECTIONS 327(A) AND 328 OF THE BANKRUPTCY CODE**

I, Brian Whittman, hereby make this Declaration pursuant to 28 U.S.C. § 1746, and state:

1. I am a Managing Director with Alvarez & Marsal North America, LLC (together with employees of its affiliates (all of which are wholly-owned by its parent company and employees), its wholly owned subsidiaries, and independent contractors, collectively “A&M”), a restructuring advisory services firm with numerous offices throughout the world. I submit this declaration on behalf of A&M (this “First Supplemental Declaration”) to supplement my prior declaration that was submitted in connection with A&M’s retention in these chapter 11 cases. Except as otherwise noted,² I have personal knowledge of the matters set forth herein.

2. On August 6, 2023 (the “Petition Date”), Yellow Corporation and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively,

1 A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

2 Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at A&M
and are based on information provided by them.

the “Debtors”) commenced these cases by filing voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Court”).

3. On August 30, 2023, the Debtors filed their *Application of the Debtors to Retain Alvarez & Marsal North America, LLC as Financial Advisors to Debtors and Debtors in Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code* [Docket No. 373] (the “Application”) and attached thereto was my declaration in support of the Application (the “Prior Declaration”).

4. I submit this First Supplemental Declaration setting forth the additional information requested by the U.S. Trustee. Capitalized terms used herein and not otherwise defined have the respective meanings set forth in the Prior Declaration.

SUPPLEMENTAL DISCLOSURES

5. Based on the Firm Procedures, A&M, its affiliates, and its Professionals do not hold any of the Debtors’ stock, other than indirectly through a public mutual fund or partnership as to which the relevant professionals have no control or knowledge of investment decisions.

6. The “related entity” referenced in footnote 4 of the Prior Declaration refers to each of the entities listed in footnote 4 in which certain A&M personnel have disclosed *de minimis* investments.

7. A&M will provide notice to the US Trustee if it intends to staff the engagement with independent contractors. Those independent contractors will be subject to the Firm Procedures set forth in the Prior Declaration, and A&M will make any disclosures required under Bankruptcy Rule 2014 regarding such independent contractors.

8. A&M does not hold or represent any interest adverse to the Debtors’ estates.

9. To the extent any information disclosed herein requires amendment or modification upon A&M's completion of further review or as additional party-in-interest information becomes available to it, a further supplemental declaration reflecting such amended or modified information will be submitted to the Court.

[Remainder of page intentionally left blank]

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: September 15, 2023

Respectfully submitted,

/s/ *Brian Whittman*

Brian Whittman
Managing Director of Alvarez & Marsal
North America, LLC